

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

HERBERT WRIGHT, III

No. 3:20-CR-30033-MGM-2

MOTION TO MODIFY TRAVEL CONDITIONS OF HERBERT WRIGHT, III
(ASSENTED TO)

Now comes Defendant Herbert Wright, III, and respectfully requests that the Court modify conditions of his release during the pendency of his release that were set at his court appearance on December 9, 2020 before Magistrate Judge Katherine A. Robertson.

As reason therefore, Wright states that from time to time his work requires him to travel for performance events to locations within the United States. Wright respectfully requests that the conditions of his release be expanded to allow him to travel for work related reasons to and from specific performance venues on specific dates provided that he provide his Probation Officer, Laura LaValley with his travel schedule to and from the venues prior to any travel and that prior to any travel, Ms. LaValley approve Wright's travel schedule.

This motion is assented to by both Assistant US Attorney, Steven H. Breslow and Wright's Probation Officer, Laura LaValley.

HERBERT WRIGHT, III,

By his attorney,

/s/ James W. Lawson

James W. Lawson (BBO #289300)

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Date: December 15, 2020

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the CM/ECF system on December 15, 2020 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and by first-class mail to any non-registered participants.

/s/ James W. Lawson

James W. Lawson